

Attorneys for Defendant NANA Services, LLC

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CLARISSA F. TOVES,
CHRISTINE D. GUZMAN,
and BRENDA L. HERNANDEZ,

V.

~~[PROPOSED]~~
DISCOVERY PLAN

Defendants.

Cross-Claimant,

V.

Cross-Claim Defendant.

Pursuant to Local Rules 16.1 and 16.2 of the District Court of Guam and the Court's Scheduling Notice dated July 18, 2003, the parties submit the following Discovery Plan:

1. Defendants Raytheon Technical Services, Guam, Inc. (Raytheon), Sodexho Marriott Services, Inc. (Sodexho), NANA Services, LLC (NANA Services) (collectively Defendants) have provided to Plaintiffs Clarissa F. Toves, Christine D. Guzman and Brenda L. Hernandez (collectively Plaintiffs) on September 15, 2003, and Plaintiffs have provided to Defendants on September 17, 2003, their initial disclosures pursuant to Fed. R. Civ. P. 26(a) and Local Rule 26.2.

2. The following is a description and schedule of all pretrial discovery each party intends to initiate prior to the close of discovery:

a. Plaintiffs intend to propound: 1) Requests for Production of Documents; 2) Interrogatories; and 3) Requests for Admissions, regarding Defendants' cross-claims and any defenses to Plaintiffs' claims.

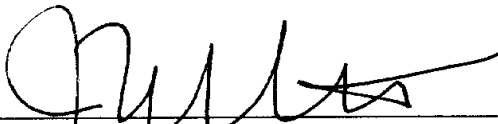
b. Defendants intend to propound: 1) Requests for Production of Documents; 2) Interrogatories; and 3) Requests for Admissions on Plaintiffs.

c. The following is a partial list of witnesses which one or more of the parties have listed as having relevant knowledge of the disputed issues and which may have to be deposed: Oliva Naputi, Harvey Bisson, Sharyl Hofer, Paul King, Dorothy Abante, Jessica Aguon, Anna Messina, George Stewart, Lawrence Whitfield, Benny Lock, William E. Lowry, Paul H. Brennan, Marie E. Krauss, Alvin "Damian" Donaldson, Noel David, Frances Abian, Joseph Majka (Mijka), Keith Swindell, Sherry Seeker, Del Strutz, Rodney Alcorn (Acorn), Maricris Bermudez, Loida

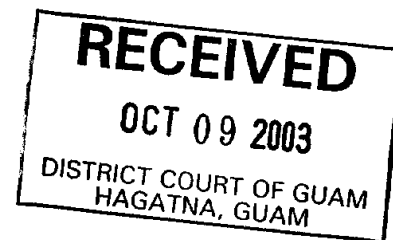
Bradford, Pam Dean, Brian Ahakuelo, Fructuoso Santos, Lilia Strutz, Cynthia Ramos-Avilla, Ryan Esposito, Lloyd Queen, Patti Russel, Brian Ahakuelo, Randy Abraham, Yolanda Ramirez, Gigi Sablan, Joseph Sanchez, Jr., Mary Taitague, and James Rauch.

d. The parties shall work cooperatively to schedule the depositions of the foregoing witnesses, including the deposition of off-island witnesses.

DATED this 31st day of December, 2003.



JOHN S. UNPINGCO
Chief District Judge

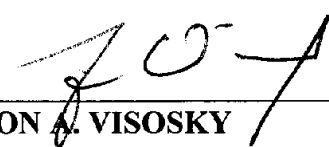


SUBMITTED BY:

DOOLEY LANNEN ROBERTS & FOWLER LLP

Date: Oct 7, 2003

By:


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Attorneys for Defendant
NANA Services, LLC

APPROVED BY:

LAW OFFICE OF SANDRA D. LYNCH

Date: 10/8/03

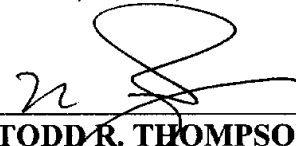
By:


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MAIR, MAIR, SPADE & THOMPSON, P.C.

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LAW OFFICES OF HORECKY & ASSOCIATES

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By:


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Raytheon Technical Services Guam, Inc.